

EXHIBIT 22

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

David W. Lynas, as Trustee for the next-
of-kin of James C. Lynas,

Court File No.: 18-cv-2301 (JRT/KMM)

Plaintiff,

vs.

**THE MEND DEFENDANTS
SUPPLEMENTAL ANSWERS TO
PLAINTIFF'S INTERROGATORIES**

Linda S. Stang, acting in her individual
capacity as a Sherburne County
correctional officers, et al.,

Defendants.

TO: Plaintiff and his Attorneys, Robert Bennett, Andrew Noel, Kathryn Bennett, and
Marc Betinsky, Gaskins Bennett & Birrell L.L.P., 333 South Seventh Street,
Minneapolis, Minnesota 55402

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendants
Alyssa Pfeifer, Jennie Thompson, Michael Robertson, PysD, Todd Leonard, M.D., and
MEnd Correctional Care, PLLC (collectively the "MEnd Defendants") by and through
their attorneys Anthony J. Novak and Carolin J. Nearing, Larson • King, LLP, 2800 Wells
Fargo Place, 30 East 7th Street, St. Paul, Minnesota, 55101, hereby submit the following
objections and supplemental answers to Plaintiff's Interrogatories subject to all of the
general objections and specific objections previously set forth. These answers are provided
as ordered by the Court arising out of the informal dispute resolution on Plaintiff's motion
to compel.

ANSWERS

INTERROGATORY NO. 3: Identify the counties/municipalities, including Sherburne County, that MEnD has contracted with between January 1, 2015 through trial.

ANSWER: The MEnD defendants object to this Interrogatory on the grounds it is overly broad and seeks irrelevant information. Notwithstanding these objections and subject to them, active Minnesota contracts with MEnD included the following counties:

Aitkin, Becker, Beltrami, Benton, Carver, Chippewa, Clay, Clearwater, Cottonwood, Crow Wing, Dakota, Douglas, Fillmore, Houston, Hubbard, Jackson, Kandiyohi, Meeker, Mille Lacs, Morrison, Nobles, Olmsted, Otter Tail, Pennington, Pine, Redwood, Renville, Sherburne, St Louis, Stearns, Traverse, Wadena, Watonwan, Wilkin, Wright.

MEnD also provides care in counties in Iowa, Wisconsin, and Illinois.

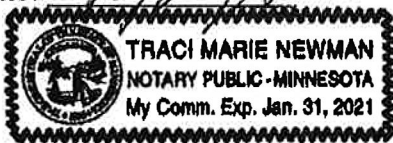
SUPPLEMENT: Subject to previously stated objections, in November, 2017, MEnD had contracts with the following counties: Aitkin, Beltrami, Benton, Carver, Chippewa, Clay, Clearwater, Cottonwood, Crow Wing, Dakota, Douglas, Fillmore, Houston, Hubbard, Kandiyohi, Meeker, Mille Lacs, Morrison, Nobles, Olmsted, Otter Tail, Pennington, Redwood, Renville, Sherburne, St. Louis, Stearns, Traverse, Wadena, Wilkin, Wright.

INTERROGATORY NO. 13: Specify each death which has occurred via non-homicidal manners in correctional facilities where MEnD Correctional Care PLLC was the contracted medical provider in the last five (5) years. For each, include the facility where the death occurred, the date on which the incident occurred and the manner of death.

ANSWER: This Interrogatory is objected to as it is overly broad as to location and in subject matter relative to the claims here, and thus does not comport with the factors of proportionality; and as seeking information that is confidential and protected by state and federal patient privacy and health record laws. Notwithstanding these objections and subject to them, MEnD does not maintain specific information regarding facility death data. However, in 2017 MEnD began keeping track of the number of in-custody deaths in the facilities for which it provides services. In 2017 there were five deaths by suicide and two non-suicide deaths; in 2018 there were two deaths by suicide and two non-suicide deaths; and as of the end of June 2019, there has been one death by suicide and one non-suicide death.

SUPPLEMENT: Subject to previously stated objections, and limited by the Court's requirement that MEnD "provide a list to the plaintiff of all suicides or suspected suicides of which it is aware that occurred in the three years ahead of the death at issue...", MEnD did not maintain records regarding deaths by suicide in facilities where it provides services prior to 2017. At this point in time, MEnD is aware of four deaths by suicide between November 2014 and November 2017: one in Beltrami County, one in Nobles County, one in Fillmore County, and one in Sherburne County. MEnD does not have information on the circumstances surrounding these suicides outside of the one in Sherburne County (Dylan Brenner). MEnD is also aware of a death by suicide sometime in 2015 in Crow Wing County, but is not aware of the circumstances surrounding that death.

Date: 10/22/19



Subscribed and sworn to before
me this 22nd day of October, 2019.

Traci Marie Newman
Notary Public

By: Todd Leonard

Todd Leonard, M.D., CCHP-P
President and CEO
MEnD Correctional Care, PLLC

Date: 10/29/19

LARSON · KING, LLP

By: [Signature]

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Leonard, MD, and MEnD Correctional Care,
PLLC

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DISTRICT OF MINNESOTA

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AFFIDAVIT OF SERVICE
BY EMAIL

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Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

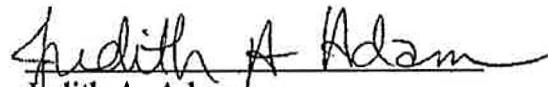
Judith A. Adam, being first duly sworn, states and alleges that on October 30, 2019,
she served the following:

1 The MEnD Defendants' Supplemental Answers to Plaintiffs' Interrogatories
upon:

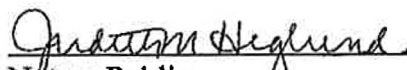
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via email.


Judith A. Adam

Subscribed and sworn to before
me on October 30 2019.


Notary Public

